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October 21, 2024

## VIA ECF

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Freeman et al. v. Giuliani*, No. 24-mc-353 (LJL)

Dear Judge Liman,

Plaintiffs Ruby Freeman and Wandrea' Moss respectfully submit this letter to update the Court on the status of negotiations in connection with their Motion to Enforce Judgment (ECF Nos. 8, 9). Plaintiffs filed their Motion on August 30, 2024, and Defendant filed an opposition brief on October 8, 2024 (ECF No. 44). Plaintiffs filed a reply brief on October 18, 2024, in which they notified the Court of ongoing discussions of a "proposal that may, if successful, moot any remaining disputes raised in Defendant's opposition to the Motion to Enforce Judgment." ECF No. 59, at 1 n.1. Plaintiffs advised the Court that they would file a status report by October 22, 2024, "updating the Court of the status of those negotiations." *Id.*

Regrettably, the negotiations have concluded without success. Accordingly, Plaintiffs respectfully submit that the Court should now decide the pending Motion to Enforce Judgment and should grant substantially all of the relief requested in that Motion for the reasons given and to the extent discussed in Plaintiffs' Reply.

Respectfully submitted,

s/ Aaron E. Nathan